

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOHN DOE,

Plaintiff,

vs.

HAVERFORD COLLEGE et al.,

Defendants.

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No.: 2:23-cv-00299-GAM

**PLAINTIFF’S EXPEDITED MOTION FOR STAY AND PROTECTIVE ORDER
AS TO FEBRUARY 13, 2024 DEPOSITION**

Plaintiff John Doe hereby moves a protective order deferring his deposition scheduled for February 13, 2024 until resolution of the Motion for Protective Order and for *In Camera* Hearing on Behalf of Intervening Student Doe (ECF 69) filed on February 7, 2024. Plaintiff also respectfully moves for a stay of his February 13, 2024 deposition pending full resolution of this motion. Plaintiff relies on his contemporaneously submitted brief. Attached are proposed orders staying Plaintiff’s February 13, 2024 deposition and imposing a protective order deferring that deposition. Plaintiff respectfully requests a decision from the Court by the close of business on Monday, February 12, 2024.

Respectfully submitted,

CLARK HILL PLC

/s/ Jonathan Z. Cohen

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Date: February 9, 2024

CERTIFICATE OF SERVICE

I, Jonathan Z. Cohen, hereby certify that on the date set forth below, the foregoing document will be filed electronically and made available for viewing and downloading from the ECF System. Service will be made electronically on the following persons:

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Date: February 9, 2024